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6 Attorneys for Plaintiff  
United States of America

7  
8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,  
12  
13 Plaintiff,  
14  
15 v.  
16  
17 APPROXIMATELY \$7,500.00 IN U.S.  
CURRENCY, and  
18 APPROXIMATELY \$2,920.00 IN U.S.  
CURRENCY,  
19  
20 Defendants.

CASE NO. 1:20-MC-00090-DAD

STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

19 The United States of America and potential claimants Brandon Jones and Kiaundra Crawford  
20 (“potential claimants”), by and through their counsel, do agree and STIPULATE as follows:

21 1. On or about July 8, 2020, potential claimants filed a claim in the administrative forfeiture  
22 proceeding with the Federal Bureau of Investigation with respect to the approximately \$7,500.00 in U.S.  
23 Currency and approximately \$2,920.00 in U.S. Currency (hereafter “defendant currency”), which was  
24 seized on May 12, 2020.

25 2. The Federal Bureau of Investigation has sent the written notice of intent to forfeit  
26 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any  
27 person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other  
28 than the potential claimants have filed a claim to the defendant currency as required by law in the

administrative forfeiture proceeding.

3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of the parties. That deadline is October 6, 2020.

4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to January 4, 2021, the time in which the United States is required to file a civil complaint forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

5. Accordingly, the parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture shall be extended to January 4, 2021.

Dated: October 6, 2020

McGREGOR W. SCOTT  
United States Attorney

By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant United States Attorney

Dated: October 6, 2020

By: /s/ Brandon Jones  
BRANDON JONES  
Potential Claimant  
(Signature retained by attorney)

Dated: October 6, 2020

By: /s/ Kiaundra Crawford  
KIAUNDRA CRAWFORD  
Potential Claimant  
(Signature retained by attorney)

IT IS SO ORDERED.

Dated: **October 9, 2020**

  
UNITED STATES DISTRICT JUDGE